

MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Norman S. Rosenbaum
Jordan A. Wishnew
Jessica J. Arett

Counsel to The ResCap Borrower Claims Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**RESCAP BORROWER CLAIMS TRUST'S OBJECTIONS TO THE DECLARATION
OF TIA DANIELLE SMITH**

Pursuant to the Court's order during the Pre-Trial Conference held on February 1, 2016 at 9 a.m. eastern standard time, the ResCap Borrower Claims Trust (the "Borrower Trust") submits the following objections to certain paragraphs of the *Declaration Under Penalty of Perjury as Direct Testimony of Tia Danielle Smith* [Docket No. 9556] (as amended by Docket No. 9584 filed on February 5, 2016).

Paragraph Number	Objection(s)
5	Irrelevant
6	Irrelevant
7	Irrelevant
10	Irrelevant
11	Irrelevant
32	Irrelevant
33	Irrelevant, lack of foundation
34	Irrelevant, lack of foundation
35	Irrelevant, lack of personal knowledge, refers to document not in evidence
36	Irrelevant, lack of personal knowledge
37	Irrelevant, lack of personal knowledge, refers to document not in evidence
42	Irrelevant
44	Irrelevant

45	Irrelevant
46	Irrelevant
47	Irrelevant, conclusion
48	Irrelevant, lack of personal knowledge
49	Irrelevant, lack of personal knowledge, conclusion
50	Irrelevant, conclusion
54	Irrelevant
58	Irrelevant
60	Irrelevant, lack of personal knowledge
61	Irrelevant, lack of personal knowledge, speculation
62	Irrelevant, lack of personal knowledge
65	<u>See</u> Objections to Nawaz Raja Declaration

Dated: February 5, 2016
New York, New York

/s/ Jordan A. Wishnew
Norman S. Rosenbaum
Jordan A. Wishnew
Jessica J. Arett
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New York, New York 10019
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